

## Bison Oil & Gas II, LLC

518 17th Street, Suite 1800 Denver, CO 80202 Phone: 720-644-6997 Fax: 303-974-1767

March 27, 2020

Mr. Gregory Sopkin EPA Region 8 Administrator U.S. Environmental Protection Agency 1595 Wynkoop St. Denver, CO 80202-1129

RE: NSPS OOOOa Certifying Official Delegation Notification

Dear Mr. Sopkin,

This letter is a notification of the delegation of NSPS Certifying Official responsibilities, as required under §60.5430a, for affected facilities operated by Bison Oil & Gas II, llc. As of the date of this letter, the Designated Representative is as follows:

Certifying Official	
Todd Wolff	VP Operations
Name	Title
Designated Representative	
Nica Hoshijo Name	Sr. Staff Environmental Specialist Title

Thank you,

Todd Wolff VP Operations

Bison Oil & Gas II, LLC



### NSPS 40 CFR 60 Subpart OOOOa - Certification of Truth, Accuracy and Completeness

The Certifying Official must provide a certification of truth, accuracy, and completeness with regards to annual report submittals under NSPS OOOa, per §60.5420a(b)(1)(iv). For the attached annual report, I certify that:

"Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

Name:	Nica Hoshijo
Title:	Sr. Staff Environmental Specialist
Signature:	Nier Wij
Date:	6/4/2020

40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 60.5420a(b) Annual Report For each pneumatic pump affected facility, an owner or operator must include the information specified in paragraphs (b)(6)(f) through (iii) of this section in all annual reports:

The asterisk (*) nex						Pneumatic Pumps Previou	usly Reported that have a Change in Reported Condition During the	Reporting Period	
(Select from dropdown list-may need to scroll up)		Was the pneumatic pump constructed, modified, or reconstructed during the reporting period? * (§60.5420a(b)(8)(i))	Which condition does the	If your route emissions to a control device and the control device is designed to achieve <95% emissions reduction, specify the percent emissions reduction. *  (\$60.5420a(b)(8)(i)(c))	Identification of Each Pump *	Date Previously Reported* (§60.5420a(b)(8)(ii))	Which condition does the pneumatic pump meet? * {\$60.5420a(b){8}(ii)}	If you now route emissions to a control device and the control device is designed to achieve 55% emissions reduction, specify the percent emissions reduction.* (§60.5420a(b)(8)(ii) and §60.5420a(b)(8)(i)(C))	Records of deviations where the pneumatic pump was not operated in compliance with requirements* (§60.5420a(b)(8)(iii) and §60.5420a(c)(16)(iii))
	e.g.: Pump 12-e-2	e.g.: modified	e.g.: Emissions are routed to a control device or process	e.g.: 90%	e.g.: Pump 12-e-2	e.g.: 10/15/17	e.g.: Control device/process removed and technically infeasible to route elsewhere	e.g.: 90%	e.g.: deviation of the CVS inspections

For the collection of fugitive emissions components at each congressor station within the company defined area, an evener or operator must include the excellent on suction the information specified in paragraphs (\$\frac{1}{2}\$) (\$\frac{1}{2}\$ through (\$\frac{1}{2}\$) of this section in all sunsus reports:

																									og	CompressorS	Estion Affected Facility Only
city facord to. " (Salest from represent to may need to send up)	Each Affected	Date of (§40.542)		Survey Begin Time (901.54204())(797)	Survey End Time (\$60,5420e(s)(7)()	Name of Surveyor (500.542040)(7)(1	* Ambient Temperature During Survey * (\$60,5420ads(7)(by))	count savey.	Maximum Wind Speed During Survey (§60.5420e(b)(7)(h))	Monitoring instrument Used * (§60.5420x(b)(7)(v))	Deviations from Monitoring Plan (if none, state none.)* (\$60.5420e(b)(7)(w))	Tigue of Component for which flugible Emissions Detected * (§60.5420a)b(7)(vij)	Number of Each Component Type for which fugitive Emissions Detected * (860.5420a(b)(7)(4))	Type of Component Not Repaired as Required in 660.5997419 * (\$60.54204(3)/7\$400)	Number of Each Component Type Not Repaired as Required In \$ 60,5927400* (\$60,542040)(7642)	Type of Cifficulate- Monitor Components Monitor of * (\$60.5420e(b)(7)(k))	Number of Each Difficult- to Alonitor Component Type Monitored * (660,5420e)(770x)	Type of Linsafe-to- Monitor Component Monitored * (§60.5420e(b)(79)x))	Number of Each Lineale to-Monitor Component Type Monitor od * (§60.5420e(s)(7)(x))	Date of Successful Repair of Fugitive Emissions Component * (800.5420a(b)(79x3)	Type of Component Placed on Delay of Aspair * (660,5430e(b)(78x8)	Number of Each Component Type Placed on Delay of Repair * (\$60,5420a(b)(70x1))	Explanation for Delay of Repub * (\$60.5420+(b)(7)(4)(\$	Type of Instrument Used to Resurvey Rejetted Components Not Rejeted During Original Survey * 1960,5420x88(79x10)	Training and Expertence of Surveyor * 8500,5420x8687909	Was a monitoring survey waived under § 60.5367 siggSp7 * (\$60.5430a@)(7))	If a monitoring survey was swill calendar months that make a quarterly monitoring seriod for the monitoring survey was we (§00.5420wbs/78)
	eq.: Well Stie ABC	e4:8/19/17		eg.: 10:00 am	ng.: 1100 pm	eg.: John Smith	44:97	eg.: Soring, no clouds	44:2mph	e.g.; Company ABC optical gas Imaging canners	eg.:None	eg.: Valve	eg:1	eq.:Yetre	egil .	e.g.: Valve	egzi	eg.Weive	agit	eg:11/10/96	e.g.: Valve	eg.11	e.g.   Unsafe to repair until next shuddown	e.g. : Company ABC optical gas imaging carriera	e.g.: Trained themographer; completed 40-hour course at XYZ Training Center. Has 10 years of experience with Olis servers	ag:Yes	egiclessery; February; and Ma
wtor	Cwor 8-59 19 Well		5/5/2019	12:50 PM		M Sterron McCbber		Surrey, no clouds	4.6 mph	Oundary Consultants of	None	rule - no leaking commonwes ide		re/a	ryle	nik - no components des	i n/a	rule - no componente desi	i ryle	ryle - no leaks found	n/s	n/a	nyle	ryle - no leeks found	Trained inuse of ON comme through ITC *Dottol desimal		N/A
wtor	Causer 8-50 to Well		10/17/2019	11:15 AM	11:54P	M Megan Stokes	81.F	Partly cloudy	4.7 mph	Counties Considered.	None	Valve	2	nds - all composents canalis	nds - all commonwels remains	nds - no commonwells des	r nyla	nde - no romnomente desi	i nje	19/13/2009	nda	n/a	ryle	rula - all leaks nevalue fansfree	Trainetinuse of DR comme through IT "Ordinal Gasiman	No	N/A

40 CRF part 90 - Standards of Proformance For Crude Oil and Natural Stan Sociéties for which Construction, Modification or Reconstructions Commonwed After Expressives 12, 2015 - 60.5420n(b) Annual Repo

The autoist (*) no	tto each field trakcates	that the corresponding field is read	*6.	PESSOPASIA JALI			E WATERLEAD		NO SECTION		PROPERTY.				Storag	re Vessela Constructed, Mor	Ified, Reconstructed or Estamed	to Service During Reporting Period	het Comply with \$60.530	infall 21 with a Control Device	Tested Under \$ 90.5417eLtl			CONTRACTOR OF THE PARTY.
Facility Record No (Select free: drap drawn Bit - need to soved ap)	50x/rage Vessel ID (600.540)with 2011 (600.540)with 2011 (600.5420with	Was the storage wasel constructed, modified or econstructed during the reporting period * [500.3423-6)(6)(8)	Lethude of Storage Vessor Declinal Dangers to 5 Declinals Valling the Novol American Desser of 1960 * (§60.3-420w[b](f))	Longitude of Storage Vessel (Decline) Degrees to 5 Decline) Using the North American Castain of 1923 * 6500.5420-0-00009	If now efficient facility or if returned to service during the reporting period, provide documentation of the VCC emissions as determination according to 960.0365464.*	Tectrific of decisions where the strange record was not operated in complaints with page records (\$00.5400m) \$8000 end \$00.5400m(\$3)000 end \$00.5400m(\$3)0000 end \$00.5400m(\$3)00000 end \$00.5400m(\$3)00000 end \$00.5400m(\$3)00000 end \$00.5400m(\$3)00000 end \$00.5400m(\$3)00000 end \$00.5400m(	have you met the requirements specified in \$00.543 (schild) and (SP* (\$00.5420 schild) and (SP* (\$00.5420 schild) are specified in \$100 schild).	Removed from service during the reporting period? * (860, 5420 with 1846)	If removed from service, the date removed from service. (960.5420e(0808/d)	Returned to service during the reporting periods* (500.5420w).arraying	if returned to service, the data returned to service. * (500,5420+8458+49	Make of Pardhaed Device" (§60,5420ab)(6)(vi) and §60,5420ab(8)(8)(848	Model of Purchased Device * \$500,5420wb360gw8 end \$500,5420wb353w66Alb	Satal Number of Parchased Device * (§60.5420s0;((G)40) and §60.5420s0;((S)60)448	Date of Purchase **  ### 1500,54204(30)(4/1958)  \$00,54204(30)(4/1958)	Copy of Punchase Onder (\$60.5420w(-)605(nd) and \$60.5420w(-)606/9(CI)	Latitude of Cormol Device Decimel Degrees to 5 Declinels Using the North American Catan- ot 1983)* (560.542/e8/98/e9) and 560.542/e6/35/4/07)	Longitude of Control Devices (Bocomai Degree to 5 Decimals Using the North-American Device of 1993)* (860-5-2008)(90) and (960-5-2006)(91) and (960-5-2006)(91) and	Irliet Ges Flow Rate * (\$00.5425e):3(0)(4) and \$40.5420e((\$3848));	Please poroide the file name that contains the Records of Plocifisms Flesser at Al Times of Operation." 1860;54256(20)46(VL) Please provide unity one lite our record.	Please provide the file name that contains the file-unds of to visible Emissions hallook Greener Trans Minuse During Any 13-Minuse Period * (550,3400±6)6/(61) and 500,3400±6/(61) and 500,3400±6/(61) and Filessa provide only one file per record.	Please provide the file name that contains the Records of Machinerance and Report of \$60.5420a0(\$60.5420a0(\$767)). Please provide only one tile per record.	Please provide the file name that consists the face do of Valide Entirebons Tos. Fullowing Return to Operation From Maintenancy (Repail Activity (SAO.3420e(3594/8F8) Entire provide only one file per report.	Wisess provide the Tierneme that contains the Records of Menufecture or Striken. Proceeding Instructions, Proceeding and Maintenance Schedule* (\$60.5420ab)(40)(40) and \$50.5420ab)(40)(40) and \$60.5420ab)(40)(40) and \$60.5420ab)(40)(40) and \$60.5420ab)(40)(40) and \$60.5420ab)(40)(40) and \$60.5420ab)(40)(40) and \$60.5420ab)(40)(40)(40) and \$60.5420ab)(40)(40)(40)(40)(40)(40)(40)(40)(40)(40
	eg:fark125	eq.:modfled	eg.134.12345	eg.:-101.12345	e.g.: 900 emissionrate is 6.5 toy. See file rate_determination.pdf for more information.	e.g.: On October 12, 2016, the plint flame was not functioning on the combustion unit controlling the storage vessel.	eg.:Yes	eg:Yes	eg:11/15/18	eg.(Yes	44:11/15/16	eg.; incinerator (kay	e.g.; 450 Combustor	44-: 123010192	e4:12/20/38	eg.:punhere_order.pdl er XYZCompressorStation.p dl	eg.: 94.52540	*6: 401.12349	eg.: 3000 sch	ng.i plotlame.pdf ar XX2Compressoritation.pdf	egureenivisrs.pid er 372Compressoritation.pid	eg:motelvigpd or X72CompresorStation.pdf	eg.; emitest.pd er 392Compressoritation.pdf	eg.; mers/frenut.pdf er XY2Compressor/kellon.pdf

40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 60.5420a(b) Annual Report For each pneumatic controller affected facility, an owner or operator must include the information specified in paragraphs (b)(5)(i) through (iii) of this section in all annual reports:

				1	Pneumatic Controllers with a Natur	ral Gas Bleed Rate Greater than 6 scfh	
(Select from dropdown list - may need to scroll up)	Pneumatic Controller Identification * {\$60.5420a(b)(1)(ii), \$60.5420a(b)(5)(i), and \$60.5390a(b)(2) or \$60.5390a(c)(2))	Was the pneumatic controller constructed, modified or reconstructed during the reporting period? * (§60.5420a(b)(5)(i))	(§60.5420a(b)(5)(i) and	Year of Installation, Reconstruction, or Modiffication* (§60.5420a(b)(5)(i) and §60.5390a(b)(2) or §60.5390a(c)(2))	Greater than 6 Standard Cubic Feet per		Records of deviations where the pneumatic controller was not operated in compliance with requirements* (§60.5420a(b)(5)(iii) and §60.5420a(c)(4)(v))
	e.g.: Controller 12A	e.g.: modified	e.g.: February	e.g.: 2017	e.g.: Controller has a bleed rate of 8 scfh.	e.g.: safety bypass controller requires use of a high-bleed controller	e.g.: Controller was not tagged with month and year of installation.

and year of installation.

40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 60.5420a(b) Annual Report For each reciprocating compressor affected facility, an owner or operator must include the information specified in paragraphs (b)(4)(i) and (ii) of this section in all annual reports:

The asterisk (\*) next to each field indicates that the corresponding field is required.

Facility Record No. * {Select from dropdown list - may need to scroll up }	Compressor ID * {\$60.5420a(b)(1)(ii)}	Are emissions from the rod packing unit being routed to a process through a closed vent system under negative pressure?  * (\$60.5420a(b)(4)(i))	If emissions are not routed to a process through a closed vent system under negative pressure, what are the cumulative number of hours or months of operation since initial startup or the previous rod packing replacement (whichever is later)? * (§60.5420a(b)(4)(i))	Units of Time Measurement * (§60.5420a(b)(4)(i))	Deviations where the reciprocating compressor was not operated in compliance with requirements* (§60.5420(b)(4)(ii) and §60.5420a(c)(3)(iii))
	e.g.: Comp-12b	e.g.: no	e.g.: 2	e.g.: months	e.g.: Rod packing replacement exceeded 36 months. Replacement occurred after 37 months.

N/A

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40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 60.5420a[b] Annual Report For each affected facility, an owner or operator must include the information specified in paragraphs (b)(1)(i) through (iv) of this section in all annual reports:

				SITE INFORMATION							ALTERNATIVE ADDRESS INFO	RMATION (IF NO PHYSICAL ADDR	ESS AVAILABLE FOR SITE *)	REPORTING I	NFORMATION	PE Certification	ADDITION	AL INFORMATION
Facility Record No.  (Field value will automatically generate if a value is not entered.)	Company Name * {§60.5420a(b)(1)(i))	Facility Site Name * (§60.5420a(b)(1)(i))	US Well ID or US Well ID Associated with the Affected Facility, if applicable. * {\$60.5420a(b)(1)(i)}	Address of Affected Facility * {\$60.5420a(b)(1)(i)}	Address 2	City •	County *	State Abbreviation *	Zip Code *	Responsible Agency Facility ID (State Facility Identifier)	Description of Site Location (\$60.5420a(b)(1)(i))	Latitude of the Site (decimal degrees to 5 decimals using the North American Datum of 1983) (\$60.5420a(b)(1)(i))	Longitude of the Site (decimal degrees to 5 decimals using the North American Datum of 1983) (§60.5420a(b)(1)(i))		Ending Date of Reporting Period.* (§60.5420a(b)(1)(iii))	Please provide the file name that contains the certification signed by a qualified professional engineer for each closed vent system routing to a control device or process. * (\$60.5420(b)(22) Please provide only one file		Enter associated fill name reference.
	e.g.: ABC Company	e.g.: XYZ Compressor Station	e.g.: 12-345-67890-12	e.g.: 123 Main Street	e.g.: Suite 100	e.g.: Brooklyn	e.g.: Kings Count	e.g.: NY	e.g.: 11221		e.g.: 7 miles NE of the intersection of Hwy 123 and Hwy 456	e.g.: 34.12345	e.g.: -101.12345	e.g.: 01/01/2016	e.g.: 06/30/2016	e.g.: Certification.pdf or XYZCompressorStation.pdf		e.g.: addlinfo.zip or XYZCompressorStati .pdf



### Bison Oil & Gas II, LLC

518 17<sup>th</sup> Street, Suite 1800 Denver, CO 80202 Phone: 720-644-6997 Fax: 303-974-1767

June 9, 2020

Mr. Gregory Sopkin
U.S. EPA Region 8 Director
Air and Toxics Technical Enforcement Program
Office of Enforcement, Compliance and Environmental Justice
Mail Code 8ENF-AT
1595 Wynkoop Street
Denver, CO 80202-1129

RE: NSPS 40 CFR 60 Subpart OOOOa Annual Report

Dear Mr. Sopkin,

Please find attached the NSPS OOOOa annual report for the Castor Fed 8-59-19 production facility per §60.5420a(b). The facility is owned and operated by Bison Oil & Gas II, LLC. In addition to the annual report, the Certification and a copy of the Delegation of Authority Letter for the designated representative are also attached.

Please contact me at nhoshijo@bisonog.com or (720) 644-6997 ext. 6-8 if there are any questions.

Sincerely,

Mier Wis

Nica Hoshijo, P.E.

Bison Oil & Gas II, LLC Sr. Staff Environmental Specialist 518 17th St., Suite 1800 Denver, CO 80202

Office: (720) 644-6997 ext. 6-8

Cell: (303) 358-9545 nhoshijo@bisonog.com

Attachments: 2019 NSPS OOOOa Annual Report for Castor Fed 8-59-19 Production Facility

Certification Statement

Copy of Delegation of Authority Letter

# Vestern Midstream

WesternMidstream.com

RECFIVED

APR 08 2020

March 20, 2020

**Enforcement and Compliance** Assurance Division

Via Certified Mail No:

91 7199 9991 7038 9172 0469

US EPA, Region 8 1595 Wynkoop Street Denver, CO 80202-1129

RE:

§ 60.7(a)(3) Notification of Startup for NSPS OOOOa Affected Facilities Latham Gas Plant Affected Facilities (process units)

Dear EPA:

Kerr-McGee Gathering LLC (KMG) is submitting this notification to correct an error in a previouslysubmitted notification of startup, and to satisfy the notification of startup requirements of 60.7(a)(3).

The initial startup of the process unit identified as "Train 2 Cryo" was erroneously reported (on the 12/23/2019 submittal) as having a startup date of December 14, 2019. The startup date for "Train 2 Cryo" was February 14, 2020.

Attached is confirmation of the notification of startup submittal to the Colorado Department of Public Health and Environment for the heater that is associated with "Train 2 Cryo".

Please contact me at (720) 929-6135 or joel kenyon@oxy.com if you have any questions or require additional information.

Sincerely.

Joel Kenyon

Air Quality Representative

Joel Renyon

This Notice of Startup was received by the Division on: 2/27/2020 9:47:38 AM



Form APCD-103

Air Pollution Control Division

# Notice of Start-up

### NOTICE REQUIRED $\underline{\text{WITHIN 15 DAYS FOLLOWING START-UP}}$ OF ALL NEW SOURCES OR

#### PERMIT ISSUANCE FOR EXISTING SOURCES REQUIRING A NOTICE OF START-UP.

Per Colorado Regulation 3, Part B, Section III.G.1, operators of air pollution emissions sources who obtain a construction permit which requires submittal of a "Notice of Start-up" within 15 calendar days of commencement of operation or permit issuance shall file this form with the Air Pollution Control Division. It is a violation of the permit if the start-up date of a new emission source is not reported within 15 calendar days of commencement of operation. If multiple pieces of equipment (i.e. "emission points") covered by a single permit (i.e. "facility-wide permit") will have different start-up dates, a separate Notice of Start-up must be filed for each emission point.

### Notification of start-up may be accomplished by filling out the form below and submitting it electronically.

- \*Upon electronic submission, an email will be generated and sent to the email address listed on the bottom line of this form under the Signature of Certifying Official and Contact Information section. The completed NOS will be attached as a PDF document.
- \*\*You must send a printed copy of this form to the Division if you do not have an AIRS ID or a permit number.

You may complete, print and mail this Notice of Start-up to the Division at the address below.

Colorado Department of Public Health and Environment APCD-SS-B1 4300 Cherry Creek Dr. South Denver, CO 80246-1530

Please contact the Division immediately at (303) 692-3150 if you have any questions or problems concerning this requirement.

1 0	• 6	•					
I. Co	mpany informat						
Compan	y name: Kerr-	McGee Gat	nering LLC				
Compan	y phone number:	720-92	29-6135	Exte	nsion:		
Compan	y mailing addres	PO Bo	x 173779		Denver	Co	lorado 80217
Compan	y mannig addres	Street ad	dress		City		State Zip code
II. Sit	e information						
Facility	name: Lath	nam Gas P	lant				
Facilit	y address	Sec 2 T31	N R66W			1	23
		Street Address		City	State	Zip Code	County
III. Pe	rmit information	Fill in either	"permit number" or "gene	eral permit" If you don	't have either, do not submit	this form electronically. You	must mail in a printed copy.
	Permit num	ber 17WE0	398		General permit	t	
IV. Eq	uipment informa	ation If submitting	this form for any type of engi	ine (i.e. compressor engine, ger	nerator, etc.), select Engine in equipme	ent type, and describe the type of engine	in the additional comments.
AIRS ID example: 126-1234-001	Equipment type	Equipment details					
,	Other	Make Tulsa Heat	ers Midstream Model	SHO 2000	Serial Number 17-279	Mfr Date	Reloc Date
123-9F22-003	Additional comments:	Train 2 m	ole sieve hea	iter, aka H-32			
	Select	Make	Model		Serial Number	Mfr Date	Reloc Date
	Additional comments:				Number	Date	Date
	Select	Make	Model		Serial Number	Mfr Date	Reloc Date
	Additional comments:	process f	are		Number		Date
V. En	nission source(s)						
				ich the above	permit number is a	assigned began on:	02/14/2020
	ignature of certif					5 5	
	e: Joel Kenyo			Joel Kenyo	n	Date:	02/27/2020
	SE Manager			kenyon@o		Phone: 720-929-6	5135 Ext:
1100.110	or manager			110119 011000	11,100111		

<sup>\*</sup>By typing your name in the signature line, you are certifying that you are an authorized representative of the company listed above, and the information provided in this NOS is true and accurate to the best of your knowledge.